I wish to support the following comment of the New America Foundation et al: "The proposed re-banding and grant of new flexibility rights to ITFS and MDS licenses should include a reallocation of approximately half the total band (90 MHz) for unlicensed public access on a primary basis;"

I am a communications industry consultant and have observed the remarkable and unexpected implementation of 802.11 by hospitals, schools, and the general business community. An entire industry has been created through the combination of open spectrum, open standards, and spontaneous user demand.

This has happened in spite of insufficient bandwidth and collision with devices such as cordless telephones.

I believe that opening up of a large adjacent band to unlicensed public use would provide great benefit to the population and would boost the economy by stimulating new product development and new services.